

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

SEP 23 2020

David J. Bradley, Clerk

United States of America  
v.  
Rodolfo Ayala-Granados (1991/MEX)Case No. *M-20-1944-M*

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 22, 2020 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

21 USC § 952

*Offense Description*

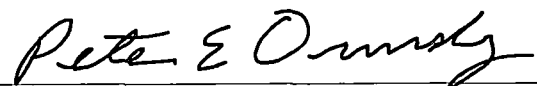
Illegal Importation of a Controlled Substance / Approximately 113.5 Kilograms of Cocaine, and 48 kilograms Methamphetamine, both Schedule II Controlled Substances.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Frances Blake

Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr. 4.1,  
and probable cause found on:Date: September 23, 2020 10:20 a.m.City and state: McAllen, Texas/s/ Lori Pendergrass*Complainant's signature*Lori Pendergrass, HSI Special Agent*Printed name and title**Judge's signature*U.S. Magistrate Judge Peter E. Ormsby*Printed name and title*

**Attachment "A"**

I, Lori Pendergrass am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On September 22, 2020, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations (OFO) at the Pharr Port of Entry (POE) in Pharr, Texas. CBP Officers (CBPOs) detained Rodolfo AYALA GRANADOS (hereinafter AYALA), a citizen of Mexico and driver of the vehicle, while attempting to enter the U.S. with approximately 113.5 kilograms (kg) of cocaine, and 48 kilograms of methamphetamine, concealed within the floor of the trailer being pulled by the tractor truck AYALA was driving.
2. The truck and trailer were referred to x-ray, and the x-ray revealed anomalies in the floor of the trailer. A K-9 detection dog also alerted to the trailer.
3. A physical search of the trailer was conducted, and a total of 261 packages were removed from within the floor of the trailer. CBPOs removed and field tested the substance inside the packages which was presumptive positive for the properties and characteristics of cocaine and methamphetamine.
4. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Hidalgo POE to assist in the investigation. HSI SAs interviewed AYALA who admitted his employer was previously stopped at the Pharr, Texas POE, driving the same tractor that was pulling a trailer that contained liquid methamphetamine inside of coconuts. AYALA had intimate knowledge of his employer's drug seizure. AYALA stated that he previously expressed desire to stop his employment to his employer due to his suspected involvement in narcotics trafficking. AYALA stated that he then returned to his employment with the same employer. AYALA also admitted to previously completing suspicious deliveries outside of industry standard.